

---

MERITS ORAL ARGUMENT SCHEDULED MAY 16,  
2025 Nos. 25-5037, 25-5055

**IN THE UNITED STATES COURT OF  
APPEALS FOR THE DISTRICT OF  
COLUMBIA CIRCUIT**

---

CATHY A. HARRIS, IN HER PERSONAL CAPACITY AND IN HER  
OFFICIAL CAPACITY AS MEMBER OF THE MERIT SYSTEMS  
PROTECTION BOARD,

*Appellee,*

v.

SCOTT BESSENT, IN HIS OFFICIAL CAPACITY AS SECRETARY  
OF THE TREASURY, ET AL.,

*Appellants.*

---

*On Appeal from the United States District  
Court for the District of Columbia*

---

**MOTION FOR ONE DAY EXTENSION TO FILE PAPER  
COPIES OF BRIEF OF GOVERNMENT ACCOUNTABILITY  
PROJECT, INC. AS *AMICI CURIAE* IN SUPPORT OF  
APPELLEE [EXPEDITED CONSIDERATION REQUESTED]**

---

Thad M. Guyer  
T.M. GUYER AND AYERS &  
FRIENDS, PC  
116 Mistletoe Street  
Medford, OR 97501  
Tel.: (206) 941-2869  
thad@guyerayers.com

*Counsel for Amici Curiae*

## **CORPORATE DISCLOSURE STATEMENT**

Pursuant to Rule 26.1 of the Federal Rules of Appellate Procedure, *amici curiae* state that no party to this brief is a publicly held corporation, issues stock, or has a parent corporation.

## NOTICE OF CONSENT TO THIS MOTION

I have received email statements of non-opposition to this motion to all the Government Accountability Project, Inc. a one-day extension to file paper copies of the brief as *amici curiae* in support of appellee in this matter. The ECF filing of the brief will be timely made by 11:59pm tonight.

## STATEMENT OF GOOD CAUSE

The undersigned counsel was retained late last night after the previously designated attorney, who is a volunteer retiree, indicated he would not be available to see the amicus preparation to its conclusion. Furthermore, the draft brief submitted to the undersigned yesterday is directed to the now-resolved issues of *en banc* review and stay. This was further complicated because the posture of the case resulted in the Appellee's brief due date being the same date as the date of the *en banc* order, that coincidence creating confusion over the effects of the previously entered scheduling order of the panel.

It is not clear that the order requiring the parties to file paper copies on the due date of April 8, 2025 applies equally to amicus briefs. To the extent the order for paper copies does apply to amicus briefs, this motion seeks a one-day extension to lodge those with the clerk's office. The undersigned will need until 11:59 pm tonight to get the ECF brief

filed.

Respectfully submitted,

Dated: April 9, 2025

/s/ Thad M. Guyer

Thad M. Guyer

**T.M. GUYER AND AYERS &  
FRIENDS, PC PLLC**

116 Mistletoe Street

Medford, OR 97501

Tel.: (206) 941-2869

thad@guyerayers.com

*Counsel for Amici Curiae*

### **CERTIFICATE OF COMPLIANCE**

This motion complies with the word limit of this Court's Rule 27 because it contains less than 5,200 words.

This filing complies with the typeface requirements of Fed. R. App. P. 32(a)(5) and the type-style requirements of Fed. R. App. P. 32(a)(6). Its typeface is Century Schoolbook, 14-point font with a word count of 550 words.

**CERTIFICATE OF SERVICE**

I hereby certify that I electronically filed the foregoing with the Clerk of the Court for the United States Court of Appeals for the D.C. Circuit by using the appellate CM/ECF system on April 9, 2025.

I certify that all participants in the case are registered CM/ECF users and that service will be accomplished by the appellate CM/ECF system.

Executed this 9th of April, 2025.

/s/ Thad M. Guyer

Thad M. Guyer

*Counsel for Amici Curiae*